

EVANGELO ARVANETES
Assistant Federal Defender
Federal Defenders of Montana
104 Second Street South, Suite 301
Great Falls, Montana 59401
vann_arvanetes@fd.org
Phone: (406) 727-5328
Fax: (406) 727-4329
Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAYCOB TYLER KUTZERA,

Defendant.

Case No. CR-17-48-GF-BMM

**DEFENDANT'S
MOTION FOR EXTENSION OF
TIME TO FILE PRETRIAL
MOTIONS**

COMES NOW the Defendant, Jaycob Tyler Kutzera, by and through his Counsel, Evangelo Arvanetes, Assistant Federal Defender and the Federal Defenders of Montana, and respectfully requests this Court for an extension of time in which to file the pretrial motions in this matter. The pretrial motions deadline is presently set for Monday, February 5, 2018, and the undersigned requests an extension until Thursday, February 8, 2018.

The undersigned also requests an equal amount of time to extend the Government's deadline as well.

Currently, jury trial is set for March 6, 2018.

This extension is to prepare motions in the present case.

1. The charges against Mr. Kutzera are serious.

2. Based upon the research of the case, the additional time period will be needed to conduct legal research for the motion(s) and review the expert's report and prepare the expert notice.

3. The undersigned has reached out to Assistant United States Attorney, Cyndee Peterson, but has not yet heard back concerning the Government's position to this extension. Nevertheless, to ensure that the Government is placed in an equal position as the defense, the undersigned also requests that their response deadline is extended for the same period of time.

WHEREFORE, the undersigned requests an extension of time to file pretrial motions in this matter currently due on Monday, February 5, 2018, until Thursday, February 8, 2018.

RESPECTFULLY SUBMITTED this 5th day of February, 2018.

/s/ Evangelo Arvanetes

CERTIFICATE OF SERVICE
L.R. 5.2(b)

I hereby certify that on February 5, 2018, a copy of the foregoing document was served on the following persons by the following means:

1, 2 CM-ECF
 Hand Delivery
3 Mail
 Overnight Delivery Service
 Fax
 E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. CYNDEE L. PETERSON
Assistant United States Attorney
United States Attorney's Office
Counsel for the United States of America
3. JAYCOB TYLER KUTZERA
Defendant

/s/ Evangelo Arvanetes _____